

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

United States of America

v.

RASHON DEMETRIC JORDAN

Case No. 2:20-MJ-1059

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 1, 2020 in the county of Halifax in the Eastern District of North Carolina, the defendant(s) violated:

Code Section

18 U.S.C. § 1073

Offense Description

The defendant traveled in interstate commerce with the intent to avoid prosecution from the state of North Carolina for the crime of Murder, a felony under North Carolina General Statute 14-17, in violation of 18 U.S.C. § 1073.

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

On this day, Brandon Peebles appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Complaint.

Date: 06/12/2020

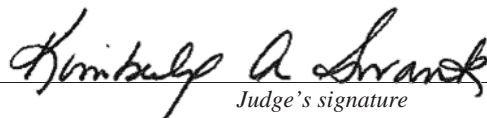
City and state: Greenville, North Carolina



Complainant's signature

Brandon Peebles, Task Force Officer, FBI

Printed name and title



Judge's signature

KIMBERLY A. SWANK, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

I, Brandon Peebles, hereafter designated as Affiant, having being duly sworn according to law, state and depose as follows:

(1) I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request an arrest warrant. I am currently assigned as a Task Force Agent with the North Carolina State Bureau of Investigation Fugitive and Missing Person Task Force and a Task Force Officer with the FBI. I have been so assigned since October of 2015. My current assignment involves the apprehension of violent fugitives. I have been the lead case agent and / or involved with the apprehension of hundreds of violent fugitives, not only in North Carolina, but throughout the United States. I am familiar with the methods deployed by fugitives to evade and thwart the efforts of law enforcement to avoid apprehension. I was employed by the East Carolina University Police Department from 1997 to 2001 as a sworn law enforcement officer. I have been employed with the Greenville Police Department since 2001 as a sworn law enforcement officer. From 2003 to 2009, I was assigned to the Greenville Regional Drug Task Force as a narcotics investigator. The Greenville Regional Drug Task Force is charged with conducting multi-jurisdictional

investigations of large-scale narcotics traffickers. From 2009 to 2015, I was assigned to the U.S. Drug Enforcement Administration (DEA) in Raleigh, North Carolina as a Task Force Officer. In total, I have over twenty-three years of combined law enforcement experience. I have attended numerous schools, seminars, and conferences dealing with fugitive apprehension, electronic surveillance, cellular analysis, drug investigations, drug identification and drug interdiction. I have received training, both formal and informal, in all levels of drug trafficking and money laundering investigations, including, but not limited to: the DEA Task Force Officer School and a two week DEA Drug Investigator's School. In connection with my official DEA and prior law enforcement duties, I have initiated and participated in long-term, historical conspiracy investigations, wiretap investigations, and Organized Crime Drug Enforcement Task Force (OCDETF) investigations. I have directed and participated in investigations of criminal violations of the federal narcotics and money laundering laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, 848, 952, 960, 963 and Title 18, United States Code, Sections 924, 1956, 1957, and 371; as well as the aiding and abetting the above offenses, in violation of Title 18, United States Code, Section 2. I have testified in state and federal judicial proceedings and prosecutions for violations of controlled substance and firearm laws. I have testified as an expert witness in the Eastern District of North Carolina in the area of drug trafficking and distribution. I have participated in numerous narcotics investigations, during the course of which I have: functioned in an undercover

capacity, personally made controlled purchases and recoveries of controlled dangerous substances, conducted or participated in physical surveillance, written and executed numerous search warrants, reviewed taped conversations and the records of narcotics traffickers, and written affidavits for court authorized Title III interception of over forty-two (42) target telephone lines.

(2) This Affidavit is made in support of an arrest warrant for RASHON DEMETRIC JORDAN. The information contained in this Affidavit is based on investigative efforts conducted by the Halifax County, North Carolina (NC) Sheriff's Office (HCSO), the North Carolina State Bureau of Investigation (SBI) and the FBI.

(3) Because the purpose of this affidavit is to set forth only the facts necessary to establish probable cause for the issuance of an arrest warrant, I have not described all of the relevant facts and circumstances of which I am aware. In addition, when I rely on statements made by others, such statements are set forth in part and in substance unless otherwise indicated.

PROBABLE CAUSE

(4) On or about June 01, 2020, the state of North Carolina issued an arrest warrant for RASHON DEMETRIC JORDAN (JORDAN) for the shooting death of Timothy Moore, which occurred on or before June 01, 2020, in Halifax County, NC, and within the Eastern District of North Carolina. To date, JORDAN has not been located in the state of North Carolina. Law enforcement believes that JORDAN fled to Washington DC to avoid prosecution for Murder in Halifax County, North Carolina.

(5) On June 4, 2020, the Halifax County Sheriff's Office received information from Ashley Lassiter during a post arrest interview that JORDAN had fled to Washington DC. During the interview, Lassiter informed law enforcement that JORDAN'S child's mother, Courtney Johnson, lives in Washington DC and that Johnson's phone number is 202-923-8991. The Halifax County Sheriff's Office was able to corroborate through law enforcement databases that Johnson did reside in the Maryland and Washington DC area. Based on this information, Halifax County Sheriff's Office obtained a state court ordered pen register and historical records request for phone number 202-923-8991.

(6) Pursuant to the service of the state court ordered pen register and records request on June 4, 2020, Verizon provided records for telephone phone number 202-923-8991. Analysis of those records and confirmation from Verizon indicated that telephone number 202-923-8991 had been changed to phone number 202-309-6879 on or about May 31, 2020. Per the ordered language contained in the state pen register court order regarding a number change, historical records were also obtained for the new telephone number 202-309-6879.

(7) Further analysis of the historical records obtained for telephone numbers 202-923-8991 and 202-309-6879 indicate that both telephone numbers had consistently been located in Washington DC and Maryland. Additionally, both phone numbers have been in frequent contact with North Carolina phone numbers, some of which are associated with the ongoing investigation in Halifax County, NC.

(8) On June 10, 2020, a confidential source who is cooperating as part of the on-going investigation was called by JORDAN, who was utilizing Courtney Johnson's "Facebook Messenger" application. After the "Facebook Messenger" call, JORDAN then called the same confidential source from telephone number 202-309-6879, that is connected to Courtney Johnson as described above. According to information from the state court ordered pen register, this phone call was made from the Maryland or Washington, D.C. area. In addition, the confidential source confirmed that this phone number is being used by Courtney Johnson as well. Investigation revealed that Courtney Johnson used phone number 202-309-6879 on June 1, 2020 to dial 911 in Washington DC.

(9) In addition to the aforementioned facts, the Halifax County Sheriff's Office has received calls from numerous confidential informants and family members of the Murder victim. Those individuals indicated that JORDAN fled to Washington DC and that he is with Courtney Johnson. Current data from the state court ordered pen register for telephone number 202-309-6879 as of June 12, 2020 indicates the telephone to be in Suitland, Maryland area. This area is consistent with Courtney Johnson's address discovered in law enforcement databases. Therefore, based on the numerous statements indicating JORDAN is staying with Courtney Johnson in the Maryland area, as well as the corroborating information of JORDAN's use of Courtney Johnson's Facebook Messenger application and telephone, this Affiant believes JORDAN has fled North Carolina to avoid prosecution for the murder of Timothy Moore.

BMD

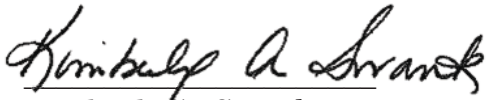
(10) Upon information and belief, this Affiant avers that probable cause exists to believe that RASHON DEMETRIC JORDAN, traveled in interstate commerce, with the intent to avoid prosecution by the state of North Carolina, following the commission of a felony, namely Murder, in violation of Title 18, United States Code, Section 1073.

FURTHER AFFIANT SAYETH NOT.

A handwritten signature in blue ink, appearing to read 'B. Peebles', written over a horizontal line.

Brandon Peebles
Task Force Officer
Federal Bureau of Investigation
Raleigh, North Carolina

Subscribed and sworn to me this 12th day of June, 2020.

A handwritten signature in black ink, appearing to read 'Kimberly A. Swank', written over a horizontal line.

Kimberly A. Swank
United States Magistrate Judge